

EXHIBIT A

EXHIBIT A – Tiare’s Terms and Supporting Evidence

<u>No.</u>	<u>Term</u>	<u>Asserted Claims</u>	<u>Tiare’s Construction and Supporting Evidence</u>
1	“venue specific application program”	(’729 Patent, claim 1, 19, 20)	<p>an application associated with one or more venues, such as a chain of restaurants or retailer stores</p> <p><u>Intrinsic Evidence</u></p> <p>’477 Patent, claims ’729 Patent, claims ’244 Patent, claims ’414 Patent, claims ’798 Application, claims</p> <p>’729 Patent, Figs. 1, 2, 5, 6, 7, 8, 9, 10, 11, 12, 13; 1:17–3:16, 3:54–7:52, 8:38–10:27, 11:25–12:28, 15:51–20:18, 20:62–22:64, 23:9–25:9.¹</p> <p>TIARE-CFL-00001570–1615.</p> <p><u>Extrinsic Evidence</u></p> <p><i>Microsoft Computer Dictionary (5th Ed.)</i></p>
2	“venue-specific application”	(’414 Patent, claim 1, 2, 8, 10, 15, 17, 19)	<p>an application associated with one or more venues, such as a chain of restaurants or retailer stores</p> <p><u>Intrinsic Evidence</u></p> <p>Same as “venue specific application program”</p>

¹ For simplicity, Tiare cites to the ’729 Patent for common specification cites.

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			<u>Extrinsic Evidence</u> Same as “venue specific application program”
3 ²	“A computer-implemented method executed by one or more processors of a first mobile computing device, the method comprising”	(’414 Patent, claim 1)	Not limiting. Plain-and-ordinary meaning. Not indefinite. <u>Intrinsic Evidence</u> ’414 Patent, claims and specification.
4	“providing, to the server system, data indicating the [updated] location”	(’414 Patent, claim 1)	Plain-and-ordinary meaning. No construction necessary. Not indefinite. <u>Intrinsic Evidence</u> ’414 Patent, claims and specification.
5	“receiving, from the server system”	(’414 Patent, claim 3)	Plain-and-ordinary meaning. No construction necessary. Not indefinite. <u>Intrinsic Evidence</u> ’414 Patent, claims and specification.
6	“A computer-implemented method executed by one or	(’414 Patent, claim 8)	Plain-and-ordinary meaning. No construction necessary. Not indefinite.

² Defendant first proposed terms 3–15 on November 16, 2021, after the P.R. 4-1 and 4-2 deadlines. Tiare reserves its right to ask the Court to decline to construe or address the definiteness of terms 2–15 based on the Defendant’s disclosure.

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	more processors, the method comprising”		<p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
7	“receiving, from the mobile computing device”	(’414 Patent, claim 8)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
8	“upon receiving an indication that an order is ready, providing the updated location of the mobile computing device”	(’414 Patent, claim 9)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
9	“identifying a computing system”	(’414 Patent, claim 10)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
10	“providing the order information”	(’414 Patent, claim 10)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p>

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			’414 Patent, claims and specification.
11	“A computer-implemented method executed by one or more processors of a server system, the method comprising”	(’414 Patent, claim 15)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
12	“receiving, from one of the mobile computing devices”	(’414 Patent, claim 15)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
13	“mapping the updated locations”	(’414 Patent, claim 15)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>
14	“sending, to a delivery computing device”	(’414 Patent, claim 16)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>

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15	“sending, to a delivery computing device”	(’414 Patent, claim 18)	<p>Plain-and-ordinary meaning. No construction necessary. Not indefinite.</p> <p><u>Intrinsic Evidence</u></p> <p>’414 Patent, claims and specification.</p>